

Email Received on August 20, 2008

Comment:

I have a rather extensive background in lighting design, as well as an electrical/electronic design and am currently the Vice President for Research & Development for an LED lighting manufacturer in the US. I have read both versions of the Energy star for SSL from both the DOE and the EPA. Both versions seem to address only luminaires and not retrofit products. I understand the investment that the DOE has put into its' Building Technologies Program is vast and is rooted in new construction and remodel products. However, with the US commercial building footprint exceeding 100 billion sq. feet and over 110 million residences. I seriously doubt new construction is the fastest way to reduce both our energy consumption and CO2 footprint. The conversion market is 10 times the size of new construction and must be addressed. A general sidenote would also be the added construction & demolition waste that will be generated to pursue this method of adoption. If we as a country do not address the retrofit model in terms of Energy Star rating, the consumer choice for energy reduction, we will never hit our energy reduction goals.

I have spoken at length with Noah Horowitz and PNL, as well as officials with the DOE regarding this misstep and there seems to be no rush to evaluate this market. I probably shouldn't include Mr. Horowitz and the NRDC in that statement, because he understands and agrees. I would like to speak with someone associated the EPA guidelines, as they are not invested in supporting a portfolio of technology development, but rather reducing energy consumption in all sectors of the market.

Sincerely,
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